

APPENDIX B

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9 | Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

13 WAYMO LLC,
14 Plaintiff,
15 vs.
16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,
18 Defendants.
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1 Plaintiff Waymo LLC (“Waymo”) hereby provides its fourth amended witness list
2 pursuant to Fed. R. Civ. P., 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and
3 Final Pre-Trial Conference in Civil Jury Cases Before the Honorable William Alsup.

4 Waymo identifies the name and, if not previously provided, the address, telephone number,
5 and anticipated testimony of each witness it may present at trial other than solely for impeachment
6 — separately identifying those the party expects to present and those it may call if the need arises.
7 Waymo further reserves the right to call any witness on any of Defendants' witness lists, further
8 including any of the witnesses identified by Defendants or Waymo on any subjects identified by
9 either Defendants or Waymo.¹

10 **I. WITNESSES WAYMO WILL PRESENT AT TRIAL**

Name	Contact Information	Substance of Testimony
Prabir Adarkar	May be reached through counsel for Uber	Mr. Adarkar may be asked to provide non-cumulative testimony regarding Uber's financial forecasts for autonomous vehicles, and Uber's competitive relationship with Waymo, including its willingness to cut prices to compete with Waymo.
Shawn Bananzadeh	May be reached through counsel for Waymo	Mr. Bananzadeh will provide non- cumulative testimony regarding costs of development of, and management of Waymo's self-driving cars and autonomous vehicle technology. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
John Bares	May be reached through counsel for Uber	Mr. Bares will be asked to provide non- cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; acquisition of Otto; and Mr.

27 ¹ Waymo's list includes witnesses who may be offered in rebuttal.
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1		Levandowski's employment milestones.
2	Gary Brown	May be reached through counsel for Waymo
3		Mr. Brown will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of log data and hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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10	Scott Boehmke	May be reached through counsel for Uber
11		Mr. Boehmke will provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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14	Dan Chu	May be reached through counsel for Waymo
15		Mr. Chu will provide non-cumulative testimony regarding matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo, Waymo's short-term and long-term business plans, Waymo's early rider program in Phoenix, Waymo's launch of its TaaS service, and Waymo's understanding of the TaaS market (including competition in that market and Waymo's competitive advantages). Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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25	Andy Crain	May be reached through counsel for Waymo
26		Mr. Crain will provide expert testimony pertaining to forensic analysis of the devices the Diligenced Employees provided to Stroz Friedberg, including flaws in the Stroz due diligence process; devices not provided to Stroz; device connections and activity on Levandowski's MacBook computer; and
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1		browser history and download history on Levandowski's MacBook computer.
2	Dmitri Dolgov	May be reached through counsel for Waymo
3		Dr. Dolgov will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets, Waymo's engineering practices, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
4	Pierre-Yves Droz	May be reached through counsel for Waymo
5		Mr. Droz will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, time to develop Waymo's LIDAR designs and trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, the contents of Waymo's SVN server, and communications with Anthony Levandowski regarding Uber and formation of Otto. Waymo further identifies the subjects of Mr. Droz's prior declarations submitted in this matter, Dkt. 25-31, 453-3 as subject he may testify about as well as the Rule 30(b)(6) topics for which he was designated as Waymo's corporate witness.
6	Eric Friedberg	May be reached through counsel for Stroz Friedberg: Melanie Blunschi Latham & Watkins 505 Montgomery Street, Suite 2000 San Francisco, CA 94111-6538
7		Mr. Friedberg will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report, and the Uber-Otto acquisition; Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure.
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1		to the Otto acquisition.
2	James Haslim	May be reached through counsel for Uber
3		Mr. Haslim will be asked to provide non- cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets (including but not limited to through Tyto LIDAR), including their acquisition, use and disclosure, and the lack of independent development.
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6	Mat Henley	May be contacted through counsel: Jennifer LaGrange Matthew Umhofer Spertus, Landes & Umhofer, LLP 1990 South Bundy Drive Suite 705 Los Angeles, CA 90025 310.826.4700 jennifer@spertuslaw.com matthew@spertuslaw.com
7		Mr. Henley will be asked to provide non- cumulative testimony regarding the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery; Uber's investigation into the Jacobs allegations and settlement with Jacobs; and Uber's competitive intelligence efforts and practices
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9	Lambertus Hesselink	May be reached through counsel for Waymo
10		Professor Hesselink will provide expert testimony pertaining to optics as it relates to a LiDAR system for a self-driving vehicle; general optics and LiDAR principles, background state of the art; explain Waymo's disclosed trade secrets relating to LiDAR optical systems and components and is expected to provide opinions regarding the level of skill and effort required to derive such trade secrets based on the available evidence in this case. Retained Prof. Hesselink is expected to also opine that Waymo's LiDAR systems embody certain of Waymo's disclosed trade secrets.
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12		Prof. Hesselink is expected to further offer opinions that (i) Waymo undertook reasonable efforts to maintain certain disclosed trade secrets in relative secrecy; (ii) such trade secrets are not generally known by individuals within the relevant field and/or are not readily ascertainable; and (iii) such trade secrets derive independent economic value by virtue of their not being generally known in the relevant field. Additionally, Prof. Hesselink is expected to opine regarding Defendants' misappropriation of certain of Waymo's disclosed trade secrets based on (i) contemporaneous technical
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1	2	3	4	5	6	evidence reflecting Defendants' acquisition, use, and/or disclosure of Waymo's disclosed trade secret concepts; (ii) the similarity of Defendants' technology to Waymo's disclosed trade secrets and/or Waymo's implementation of such trade secrets in Waymo's commercial products; and/or (iii) the lack of evidence supporting Defendants' independent development of their own technology.																		
7	Jeff Holden	8	9	10	11	12	May be reached through counsel for Uber	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	Mr. Holden will be asked to provide non-cumulative testimony regarding the state of Uber's autonomous vehicle program before the Otto acquisition; negotiations with Mr. Levandowski regarding the acquisition; Mr. Levandowski's consulting work; facts surrounding Mr. Levandowski's continued employment with Uber and termination; and Defendants' misappropriation of Waymo's trade secrets.
Richard Jacobs	May be contacted through counsel: Martha Boersch Boersch Shapiro LLP 1611 Telegraph Avenue, Suite 806 Oakland, California 94612-2147 (415) 500-6640 mboersch@boerschshapiro.com	Mr. Jacobs will be asked to provide non-cumulative testimony regarding the allegations he made and Uber's reactions thereto, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; Jacobs' settlement with Uber, and consulting services provided to Uber.																						
Michael Janosko	May be reached through counsel for Waymo	Mr. Janosko will provide non-cumulative testimony regarding reasonable measures to protect security at Google and Waymo, including Google's enterprise infrastructure.																						
Travis Kalanick	May be reached through counsel: Melinda Haag Orrick 405 Howard Street San Francisco, CA 94105-2669 +1 415 773 5495	Mr. Kalanick will be asked to provide non-cumulative testimony regarding Uber's driverless car program; Uber's solicitation of Google and Waymo employees; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination; negotiations with Mr. Levandowski regarding the founding of Ottomotto and Otto Trucking, and Otto																						

1	mhaag@orrick.com	acquisition; the Uber-Otto acquisition; solicitation of Google/Waymo employees; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; destruction of relevant evidence; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs.	
2	Anthony Levandowski	May be reached through counsel: Miles Erlich Ramsey & Ehrlich LLP 803 Hearst Avenue Berkeley, CA 94710 Tel: (510) 548-3600 miles@ramsey-ehrlich.com	Mr. Levandowski will be asked to provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, his performance at Waymo, the contents of Waymo's SVN server, and communications with Google employees regarding Uber and formation of Otto; Uber's driverless car program; Uber's solicitation of Google and Waymo employees; the relationship between the facts surrounding this case and his termination; negotiations regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence. Waymo further identifies those subjects identified in Waymo's Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial. Dkt. 835.
3	John Krafcik	May be reached through counsel for Waymo	Mr. Krafcik will provide non-cumulative testimony regarding Waymo's business; Anthony Levandowski, and his departure from Google; the relationship between Waymo and Google; and Waymo's development of its TaaS service, and

1		valuations of Chauffeur.
2	Melanie Maugeri	May be reached through counsel for Stroz Friedberg
3		Ms. Maugeri will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
4	Brian McClendon	May be reached through counsel for Uber
5		Mr. McClendon will be asked to provide non-cumulative testimony regarding solicitation of and negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; and the Uber-Otto acquisition, the development of Uber's self-driving technology, including before the Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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11	Angela Padilla	May be reached through counsel for Uber
12		Ms. Padilla will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; Levandowski's employment and continued employment at Uber; the relationship between the facts surrounding this case and his termination; and the Uber-Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; destruction of relevant evidence; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs.
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20	Gaetan Pennecot	May be reached through counsel for Uber
21		Mr. Pennecot will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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24	Cameron Poetzcher	May be reached through counsel for Uber
25		Mr. Poetzcher will be asked to provide non-cumulative testimony regarding Uber's negotiations with Mr. Levandowski regarding the formation of Ottomotto/Otto Trucking; and the acquisition; solicitation of Google/Waymo employees; destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and
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1		report.
2	Nina Qi	May be reached through counsel for Uber
3		Ms. Qi will be asked to provide non-cumulative testimony regarding Uber's decision to acquire Ottomotto (and to enter into an option to acquire Otto Trucking); contacts between Uber and Mr. Levandowski regarding the formation of Ottomotto / Otto Trucking, Uber's acquisition of those entities, and the benefits that Uber would obtain via those acquisitions; Uber's solicitation of Google/Waymo employees; Uber's internal views on those subjects, destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and report.
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10	Lior Ron	May be reached through counsel: Taylor & Patchen, LLP One Ferry Building, Suite 355 San Francisco, CA 94111 T: (415) 788-8200
11		Mr. Ron will be asked to provide non-cumulative testimony regarding the misappropriation of Waymo trade secrets; founding of Ottomotto and Otto Trucking; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and the business and product development of Ottomotto and Otto Trucking, destruction of relevant evidence; Uber ATG's use of ephemeral communications and non-attributable devices and its relationship with Uber's Threat Operations division; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with Jacobs. ..
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19	Joe Spiegler	May be contacted through counsel: Dave Resnicoff Erin Gasparka Riley Safer Holmes & Cancila LLP 70 W. Madison Street Suite 2900 Chicago, Illinois 60602 (312) 471-8700 dresnicoff@rshc-law.com egasparks@rshc-law.com
20		Mr. Spiegler will be asked to provide non-cumulative testimony regarding the Richard Jacobs letter and resignation email and allegations therein, investigation into Jacobs' allegations, and settlement with Jacobs; and Uber management's lack of deference to the legal department or legal advice.
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26	Justin Suhr	May be reached through counsel for Uber
27		Mr. Suhr will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; and allegations made by Richard Jacobs, Uber's investigation into the Jacobs allegations and settlement with
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1		Jacobs .
2	Eric Tate	May be reached through counsel for MoFo
3		Mr. Tate will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; destruction of relevant evidence; Uber's counsel's awareness of the Jacobs resignation email and letter and allegations therein; and Uber's investigation into the Jacobs allegations and settlement with Jacobs..
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5	Jim Timmins	May be reached through counsel for Waymo
6		Mr. Timmins will provide expert testimony regarding customary practices with respect to M&A transactions (including regarding indemnification) and the consideration paid by Uber to acquire Ottomotto (including relative to other acquisitions).
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8	Salle Yoo	May be reached through counsel for Uber
9		Ms. Yoo will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis investigation, and report; continued employment and termination of Anthony Levandowski; and Defendants misappropriation of Waymo's trade secrets; destruction of relevant evidence; the Richard Jacobs letter and resignation email and allegations therein, investigation into Jacobs' allegations, and settlement with Jacobs; and Uber management's lack of deference to the legal department or legal advice.
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11	Sasha Zbrozek	May be reached through counsel for Waymo
12		Mr. Zbrozek will provide non-cumulative testimony concerning Google/Waymo's forensic investigation, particularly the SVN server and related log data, including Mr. Levandowski's download of the 14,000 files from the SVN server; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories , and computer networks
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1 **II. WITNESSES WAYMO MAY PRESENT AT TRIAL IF THE NEED ARISES**

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Name	Contact Information	Substance of Testimony																								
Rey Allie	Unknown	Matters that concern the allegations made by Richard Jacobs, and Uber's reactions thereto, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices.																								
Chelsea Bailey	May be reached through counsel for Waymo	Ms. Bailey will provide non-cumulative testimony regarding the Chauffeur Bonus Plan; Mr. Levandowski's departure from Google, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team; and Mr. Levandowski's performance as a Google/Waymo employee																								
Travis Bellanger	May be reached through counsel for Waymo	Mr. Bellanger will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into the activities of Anthony Levandowski, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team																								
Adam Bentley	May be reached through counsel for Uber	Mr. Bentley will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.																								
Matthew Blattmachr	Bismuth Trust; May be reached through counsel:	Mr. Blattmachr will be asked to provide non-cumulative testimony regarding the ownership of Levandowski's																								

1	Diane F. Valentine	companies
2	Jermain, Dunnagan & Owens, PC	
3	3000 A Street, Suite 300	
4	Anchorage, AK 99503	
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7	Don Burnette	May be reached through counsel for Uber
8		Mr. Burnette will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs and planner software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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15	Neel Chatterjee	May be reached through counsel for Otto Trucking
16		Mr. Chatterjee will be asked to provide non-cumulative testimony regarding Goodwin Procter's possession of misappropriated materials; destruction of relevant evidence; chain of custody of Anthony Levandowski's personal laptops, and searches thereof.
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21	Hanley Chew	May be reached through counsel for Stroz Friedberg
22		Mr. Chew will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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24	Gerard Dwyer	May be reached through counsel for Waymo
25		Mr. Dwyer will provide non- cumulative testimony regarding inputs to Waymo's current P&L. He may also provide testimony regarding Waymo's current business plan.
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28	Paul French	May be reached through
		Rebuttal of expert testimony of Kevin Faulkner, including

1		counsel for Waymo	opinions related to the various flaws and errors in Stroz's search for Waymo confidential information at Uber; rebuttal of expert testimony of Erik Laykin, including opinions related to the Waymo forensic investigation, Anthony Levandowski's download of the 14,000 files, Radu Raduta's download of confidential documents from Google Drive and Sameer Kshirsagar's download of confidential documents from Google Drive
10	Nick Gicinto	May be contacted through counsel: Jennifer LaGrange Matthew Umhofer Spertus, Landes & Umhofer, LLP 1990 South Bundy Drive Suite 705 Los Angeles, CA 90025 310.826.4700 jennifer@spertuslaw.com matthew@spertuslaw.com	Mr. Gicinto will be asked to provide non-cumulative testimony regarding the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
18	Arturo Gonzalez	MoFo; May be reached through counsel for Uber	Mr. Gonzalez will be asked to provide non-cumulative testimony regarding MoFo's possession of misappropriated materials; destruction of relevant evidence; and Defendants' knowledge of same; Uber's counsel's awareness of the Jacobs resignation email and letter and allegations therein; and Uber's investigation into the Jacobs allegations and settlement with Jacobs. As Waymo previously advised Uber, Waymo does not intend to call Mr. González as a witness unless Defendants open the door by claiming that they complied with their discovery obligations.

1	Kristin Gudjonsson	May be reached through counsel for Waymo	Mr. Gudjonsson will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server
2	Bruce Hartley	May be reached through counsel for Waymo	Rebuttal of expert testimony of Erik Laykin, including opinions related to security measures taken by Google/Waymo to protect their confidential and proprietary information, including but not limited to materials stored in Waymo's SVN repository
3	Don Harrison	May be reached through counsel for Waymo	Mr. Harrison will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, and Waymo's valuations.
4	Jennifer Haroon	May be reached through counsel for Waymo	Ms. Haroon will provide non-cumulative testimony regarding details of Waymo's first P&L, the negotiation of the valuation used in connection with the Chauffeur Business Plan, the timing of payments made under the Chauffeur Business Plan, and the 409(a) valuation conducted when Waymo was spun off from Google. Ms. Haroon may also provide testimony regarding the evolution of Waymo's business plan over time. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for

1	2	which she was designated as Waymo's corporate witness.
3	Ben Ingram	May be reached through counsel for Waymo
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9	Scott Johnston	May be reached through counsel for Waymo.
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14	Rudy Kim	MoFo
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19	Asheem Linaval	May be reached through counsel for Uber
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25	David Lawee	May be reached through counsel for Waymo
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		valuations, Waymo's valuations, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
5 6 7 8 9 10 11	Max Levandowski May be reached through counsel for Uber	Mr. Levandowski will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
12 13 14 15 16 17	Rhian Morgan May be reached through counsel for Uber	Ms. Morgan will be asked to provide non-cumulative testimony regarding the founding and business of Ottomotto and Otto Trucking; Uber's acquisition of Otto; and the Stroz due diligence analysis, investigation, report; Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
18 19 20 21 22 23 24 25	Jake Nocon May be contacted through counsel: Jennifer LaGrange Matthew Umhofer Spertus, Landes & Umhofer, LLP 1990 South Bundy Drive Suite 705 Los Angeles, CA 90025 310.826.4700 jennifer@spertuslaw.com matthew@spertuslaw.com	Mr. Nocon will be asked to provide non-cumulative testimony regarding the allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
26 27 28	Daniel Ratner May be reached through counsel for Uber	Mr. Ratner will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets

1	2	3	4	including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs.
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1	Alan B. Exelrod RUDY EXELROD ZIEFF & LOWE LLP 351 California Street Suite 700 San Francisco, CA 94104 415.434.9800 abe@rezlaw.com	allegations made by Richard Jacobs, including the use of ephemeral communications, non-attributable devices, and improper privilege designations to avoid discovery, and Uber's competitive intelligence efforts and practices; and Uber's investigation into the Jacobs allegations and settlement with Jacobs.
7	Chris Urmson May be reached through counsel: Benjamin L. Singer 601 Montgomery St. Suite 1950 San Francisco, CA 94111 <u>415-500-6080</u>	Mr. Urmson will provide non-cumulative testimony regarding the history and development of Waymo's self-driving car technology, including its LIDAR designs; Mr. Levandowski's performance at Google and circumstances surrounding his termination from Google; Chauffeur Bonus Plan; Waymo valuation(s).
14	Tim Willis May be reached through counsel for Waymo	Mr. Willis will provide non-cumulative testimony regarding Waymo's supply chain operation, including reasonable steps taken to protect confidential and proprietary information shared with suppliers.

19 **III. WITNESSES WHO MAY TESTIFY BY DEPOSITION**

20 The following witnesses may testify by deposition:

21 Anthony Levandowski

22 Travis Kalanick

23 Nina Qi

25 Bill Gurley

26 Jeff Holden

27 John Bares

28 Gaetan Pennecot

1 Dan Gruver
2 James Haslim
3 Cameron Poetzcher
4 Scott Boehmke
5 Lior Ron
6 Adam Bentley
7 Rhian Morgan
8 Don Burnette
9 Ognen Stojanovski
10 Salle Yoo
11 Asheem Linaval
12 Angela Padilla
13 Justin Suhr
14 Eric Tate
15 Rudy Kim
16 John Gardner
17 Chris Urmson
18 Brian McClendon
19 Bryan Salesky
20 Eric Friedberg
21 Hanley Chew
22 Mary Fulginiti
23 Melanie Maugeri
24 Richard Jacobs
25 Joe Sullivan
26 Joe Spiegler
27 Mat Henley
28 Ed Russo

1 Craig Clark

2 Nick Gicinto

3 Jake Nocon

4 DATED: January 19, 2018

5 QUINN EMANUEL URQUHART & SULLIVAN,
6 LLP

7 By */s/ Charles K. Verhoeven*

8 Charles K. Verhoeven

9 Attorneys for WAYMO LLC

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